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7 UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT COURT OF CALIFORNIA

8 In re:
9 Tina L Clark

Case No: 15-22547
Chapter: 13
DCN: BLG-7

10 Debtor(s).

11 **STIPULATED EX PARTE MOTION TO ALLOW**
12 **MODIFICATION OF DEBTORS' CHAPTER 13 PLAN**
PURSUANT TO LBR 3015-1(d)(3)

13 The Debtor and David P Cusick, Standing Chapter 13 Trustee, jointly move to modify the plan to move Nationstar
14 Mortgage LLC (for 1st DOT) from Class 4 to Class 3 and to adjust the percentage to unsecured.

- 15 1. Nationstar Mortgage, LLC filed a Motion for Relief from Stay on 11/26/19 (DN 170), which was granted on
16 1/11/20 (DN 190). Based on this Nationstar Mortgage, LLC (for 1st DOT), which is currently being treated
17 as a Class 4, shall be treated as Class 3, to be surrendered.
- 18 2. Debtor's percentage to unsecured in Section 2.15 of her confirmed First Modified Plan (DN 74) was listed at
19 0%, but the Trustee later changed that as a result of an audit. The percentage to unsecured should be 50%
- 20 3. All other terms of Debtor's recently confirmed Fourth Modified Plan shall be remain the same
- 21 4. Notice to the creditors is not deemed necessary, as the modification made herein will not have a negative
22 impact on the treatment of their claims.

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1 IT IS HEREBY STIPULATED that Nationstar Mortgage, LLC (for 1st DOT) shall be treated as a Class 3 and that
2 the percentage to unsecured shall be 50%

3 DATED: 2/21/20

4 By: /s/Chad M Johnson
5 Chad M Johnson, Esq.
6 Attorney for the Debtors

7 DATED: 3/17/2020

8 By: Kristen Koo
9 Kristen Koo, Attorney for
10 David P Cusick, Chapter 13 Trustee
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